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6 *Attorney for Defendant Kristin Rene Wilson*

7  
8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 KRISTIN RENE WILSON,

15 Defendant.

CASE NO.: 2:16-mj-00118-GWF

**STIPULATION AND ~~PROPOSED~~  
ORDER TO AMEND CONDITIONS OF  
PRETRIAL RELEASE**

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, Esq.,  
18 United States Attorney, and Kathryn Newman, Esq., Assistant United States Attorney, counsel for the  
19 United States of America, and Daniel J. Hill, Esq., counsel for defendant Kristin Rene Wilson, that Ms.  
20 Wilson's conditions of pretrial release be amended to permit travel to California.

21 Ms. Wilson made her initial appearance in a Rule 5(c)(3) proceeding before this Court on  
22 February 5, 2015. *See* Minutes of Proceedings, doc. 1. Ms. Wilson was released on PR bond. *See* PR  
23 Bond, doc. 7. As a condition of pretrial release, Ms. Wilson's travel is limited to Clark County and the  
24 District of Idaho for court. The parties now agree to amend this condition to allow travel to California.

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1 Specifically, Ms. Wilson seeks permission to stay with her mother, who resides in Moreno Valley,  
2 California. Ms. Wilson's defense counsel has corresponded with Ms. Wilson's pretrial services officer,  
3 who has no objection to this amendment.

4 DATED this 10<sup>th</sup>, day of February 2016.

6  
7 /s/ Daniel J. Hill  
8 DANIEL J. HILL, ESQ.  
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10 WOLF, RIFKIN, SHAPRIO,  
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14 *Counsel for Defendant Kristin Rene Wilson*

7 /s/ Kathryn Newman  
KATHRYN NEWMAN, ESQ.  
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333 Las Vegas Boulevard South, Suite 500  
Las Vegas, Nevada 89101  
Assistant U. S. Attorney

13 **IT IS SO ORDERED.**

14 DATED this 10<sup>th</sup> day of February 2016.

16   
17 GEORGE FOLEY, JR.  
18 UNITED STATES MAGISTRATE JUDGE